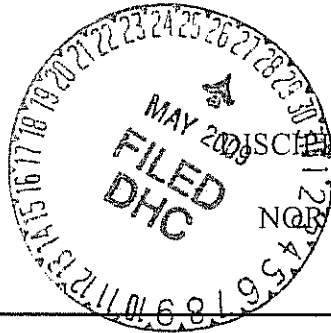


NORTH CAROLINA
WAKE COUNTY



BEFORE THE
DISCIPLINARY HEARING COMMISSION
OF THE
NORTH CAROLINA STATE BAR

THE NORTH CAROLINA STATE BAR,)
Plaintiff)

v.)

GREGORY C. BUTLER,)
Defendant)

ANSWER

NOW COMES, Gregory C. Butler, through counsel, and respectfully answering the Complaint of the North Carolina State Bar filed herein, alleges and says:

INTRODUCTION

On July 18, 2006, Tiffany Ann Bassett shot and killed her live-in boyfriend, Keith West. On July 20, 2006, Ms. Bassett was arrested and charged with First Degree Murder. (*State v. Tiffany Ann Bassett*, Johnston County Superior Court, 06 CRS 56645). Initially, the case was prosecuted for the State by Thomas H. Lock, District Attorney for Judicial District 11-B. Ms. Bassett's court appointed attorney was W. Robert Denning, III. All original motions, court hearings and discovery requests and responses were primarily supervised by Mr. Lock. When the Hon. Knox Jenkins announced in 2006 that he would not seek re-election, Mr. Lock ran for and was elected to the position of Judge of the Superior Court for Judicial District 11-B. In that same election, Susan H. Doyle became the District Attorney-Elect and took over primary responsibility for the prosecution of Ms. Bassett's case.

Gregory C. Butler has been practicing law in North Carolina since his admission in September, 1985. He began his work as an Assistant District Attorney for the 11th Judicial District in the office of William Andrews until 1998. From 1999 – 2002, he worked in the same office for then, District Attorney, G. Dewey Hudson. From 2003 – 2006, he was an Assistant District Attorney in the office of Hon. Edward W. Grannis, Jr., District Attorney for the 12th Judicial District (Cumberland County). When Ms. Doyle was elevated from her previous position as an Assistant District Attorney to the office of District Attorney for Judicial District 11-B, she sought an experienced assistant and Mr. Butler joined her office on December 13, 2006. While he worked for a very short time out of the District Attorney's office in Johnston County, in February, 2007, he was assigned to the Harnett County office and would remain there until August 31, 2007. Prior to his assignment to the Harnett County office in early 2007, he had no involvement in any aspect of the case against Tiffany Ann Bassett. When he returned to Johnston County, the trial date for Ms. Bassett's charges had already been set for November 26, 2007.

Prior to his return to Johnston County, and during August, 2006, there had been a series of hearings on various discovery matters in Ms. Bassett's case that had been heard before the Hon. Jack A. Thompson, which had been handled by Ms. Doyle for the State. Shortly after his return to the Johnston County office and in early September, 2007, Ms. Doyle assigned the upcoming trial of Ms. Bassett to Greg Butler. Mr. Butler's first involvement in the case occurred in mid-September, 2007 when he sat in an "evidence view" with Ms. Doyle and Mr. Denning. This process took a couple of days to complete and Mr. Butler made arrangements for Mr. Denning to obtain copies of all documents or

exhibits that he had requested be provided to him during that evidence view. It was Mr. Butler's understanding that, in the year plus since the charges had been filed against Ms. Bassett, that there had been discovery exchanged from the District Attorney's office to Mr. Denning, including copies of files from the SBI (which had participated in the initial investigation) and Johnston County Sheriff's Department, and, in the two days that he spent in this "evidence view," it certainly appeared that the District Attorney's office was providing Mr. Denning with access to what it might have in its file and/or what he requested.

As the matter moved closer to its November 26, 2007 trial date, there were some further hearings conducted on pre-trial and discovery issues in which it became apparent that Mr. Denning believed that there was information (specifically, from the Medical Examiner's office) that he felt he had not yet seen or had access to in his preparation. Since an issue for the defense of Ms. Bassett involved the actual "time of death" of Mr. West, it was recognized that this was important information for the defense to have and it was agreed to continue the trial from its scheduled November 26, 2007 setting. As the record clearly reflects, there were a number of additional hearings conducted thereafter that dealt with some discovery issues and the setting of a new trial date. Ultimately, the trial was rescheduled to begin on March 17, 2008.

As would be true of any experienced litigator preparing for trial, Mr. Butler and his assistants were reviewing all of the files that had been made available to them in the weeks immediately prior to the commencement of Ms. Bassett's trial date. In doing this review and, in early March, 2008, Mr. Butler came across some relatively minor pieces of information in a file from the Sheriff's office that he did not recall seeing previously and

he immediately had it copied and provided to Mr. Denning. There has never been any question raised over Mr. Butler's providing of this information to the defense either by Mr. Denning or the State Bar to Mr. Butler's knowledge.. In addition, and approximately, one week prior to trial, Mr. Butler learned that there existed a gas station receipt for Ms. Bassett which had been turned in to investigating officers that was possibly "time sensitive" to the issues involved in the trial. Mr. Butler made an immediate effort to track that lead down with the Sheriff's Department and, in doing so, found a file that he had never seen which contained approximately 437 pages. When he reviewed that file, it appeared to him that most of the material in that file had been previously reviewed and provided to the defense (sometimes with SBI file materials) although,, after discussions with appropriate personnel within the District Attorney's office, it did not appear that this specific file had been received or reviewed previously by that District Attorney's office. In order to comply with his understanding of his professional responsibilities pursuant to previous interpretations of the Constitutions of the United States and North Carolina, as they had been interpreted by our highest courts as well as the requirements of North Carolina statute law and the Rules of Professional Responsibility (Rule 3.8), Mr. Butler directed that a complete copy of every document in that 437 page file from the Sheriff's office be copied and provided to Mr. Denning. In addition, Mr. Butler immediately and personally notified Mr. Denning of what he had discovered and the steps he was taking to see that the material was immediately provided to him for review. This was accomplished on March 12, 2008.

When the case was called for trial before the Hon. Lynn Johnson on March 17, 2008, defense counsel moved to suppress certain evidence that might have been

contained in the materials provided to him on March 12, 2008. While opposing the Motion to Suppress and in open court, Mr. Butler stated to the court (in a discussion involving the issue of whether or not the trial should proceed at that time), that: "I think that there is prejudice (to the defendant), your Honor, if it's tried this week." As a result of that hearing and with the consent of Mr. Butler, Judge Johnson ordered the case continued for one month or until April 21, 2008. Thus, the anticipated delay in the trial of this murder trial was anticipated to be approximately one month so that the defendant and her counsel would have time to fully review and consider the materials delivered to them by Mr. Butler. As a result of the "late discovery" about which the State Bar now complains in this action, the administration of justice was delayed for no more than a one month period of time.

When the North Carolina State Bar initiated its own investigation and complaint into this matter (ostensibly on a comment contained in Judge Johnson's Order continuing the case which had been published in the *News & Observer*), both Mr. Butler and Judge Johnson recused themselves from further representation or involvement in the case and it was necessary to continue the start of the trial until June, 2008. This additional two month delay was the result of the State Bar's actions and not those of this Defendant. When the new Assistant District Attorney to whom the case had been assigned had a death in his family, the case was again continued and was actually called for trial in late August, 2008 by which time, the defendant and her attorney had all of the discovery and files which Mr. Butler voluntarily provided to them on March 12, 2008, for more than five (5) months..

The trial proceeded through Friday, September 5, 2008. At that point in the trial and, after having reviewed all the discovery materials provided to the defense in March, 2008 and prior to the State resting its case, Ms. Bassett pled "Guilty" to Second Degree Murder and received an active sentence of imprisonment for a minimum of 221 months and a maximum of 275 months, with credit to be given for her 779 days spent in confinement prior to the sentence (approximately, 29 months). In this instance, justice delayed (for approximately five and a half months) was not justice denied nor would it appear that the administration of justice had been unduly prejudiced.

ANSWER

Answering the allegations contained in the Complaint, the Defendant alleges and says as follows:

1. The allegations of paragraph 1 of the Complaint are admitted.
2. In response to the allegations of paragraph 2 of the Complaint, Mr. Butler was admitted to the practice of law in North Carolina in September, 1985.
3. The allegations of paragraph 3 of the Complaint are admitted.
4. It is admitted that Mr. Butler assumed primary responsibility for the prosecution of *State v. Tiffany Ann Bassett* in mid to late September, 2007.
5. In response to the allegations of paragraph 5 of the Complaint, the Order of the Hon. Jack A. Thompson referred to in this paragraph was actually "entered" in open court on August 14, 2007, was signed by Judge Thompson on September 24, 2007 and was filed on September 25, 2007. That Order, entered in the matter of *State v. Tiffany Ann Bassett*, speaks for itself and the allegations of paragraph 5 which purport to reference some portions of some of the terms of that Order, are not denied. Greg Butler

did not participate in the hearing before Judge Thompson on August 14, 2007, as he was not then involved in this matter and the State was represented by District Attorney, Susan Doyle.

6. In response to the allegations of paragraph 6 of the Complaint, the Order of the Hon. Jack A. Thompson which was entered in open court on August 14, 2007, signed on September 24, 2007 and filed on September 25, 2007 referenced in the preceding response speaks for itself and the allegations of this paragraph are not denied. Greg Butler did not participate in the hearing before Judge Thompson on August 14, 2007 and the State was represented by District Attorney, Susan Doyle.

7. In response to the allegations of paragraph 7 of the Complaint, the Order of the Hon. Jack A. Thompson which was entered in open court on August 14, 2007, signed on September 24, 2007 and filed on September 25, 2007 speaks for itself and the allegations of this paragraph are not denied. This Defendant did not participate in that hearing and the State was represented by District Attorney, Susan Doyle.

8. In response to the allegations of paragraph 8 of the Complaint, the Order of the Hon. Jack A. Thompson which was entered in open court on August 14, 2007, was signed on September 24, 2007 and filed on September 25, 2007 speaks for itself and the specific language referenced in this paragraph is not denied as being contained in that Order. The Defendant did not participate in that hearing and the State was represented by District Attorney, Susan Doyle.

In further response to this paragraph, the Defendant alleges that it was in compliance with that portion of all the Orders entered as a result of that hearing on August 14, 2007, whereby the Court reminded the State that, in addition to producing the

specified documents referenced in those eleven (11) orders, the Orders directing the State to produce documents was “continuing in nature” and any additional information discovered by or on behalf of the State, was to be produced “immediately when such information becomes known to the State” (which language was contained in nearly all Orders entered on that date). It was this specific obligation which is imposed on the State by past judicial interpretation of both the federal and state judiciary, as well as North Carolina statute law, that led Mr. Butler to provide counsel for Ms. Bassett additional discovery. This production included all items, evidence or information which he discovered after he took over primary responsibility for this case which he concluded might not have been previously provided to defense counsel or such documents that he found as he further reviewed the files in preparation for hearings before the various judges who heard this matter or in final preparation for trial. This “discovery” and disclosure included the 437 pages he discovered from the Johnston County Sheriff’s office which he provided to Mr. Denning on March 12, 2008.

9. In response to the allegations of paragraph 9 of the Complaint, it is admitted that the quoted language attributed to this Defendant is an accurate recordation of what he said to the Court on October 29, 2007. If the statement attributed to Mr. Butler in this paragraph whereby he stated that the he felt that that State “made every effort to comply with all the discovery requests and discovery orders as required by law” is intended by the State Bar to infer any lack of candor by him with the court or with defense counsel, a more complete answer is required.

The primary purpose of the October 29, 2007 hearing was to consider a defense motion for a continuance of the trial of Ms. Bassett which was then scheduled for

November 26, 2007. At the cornerstone of the motion to continue was Mr. Denning's continuing contention that there was discovery that he had not yet seen, which he felt had been previously ordered to be produced. However, he informed the court that he recognized that Mr. Butler had only recently been involved with the case when he stated, in part: "I think he's (Greg Butler) just gotten into this case. He's only been in it for six weeks.....I'm satisfied he probably was unaware of all the items that you (Judge Thompson) ordered produced." In response, Mr. Butler, reviewed with the Court what meetings he had held with Mr. Denning and what disclosures he and his staff had made to Mr. Denning on behalf of Ms. Bassett since he (Greg Butler) had become involved in the case. He went on to state that: "We certainly want to comply with all the orders of the Court and will do so. We have feverishly, since I've been involved in this case, (been sic) complying with discovery." Mr. Denning acknowledged that effort when he noted for the Court that: "I'm (not) insensitive to the fact that the case has just been handed off to Mr. Butler." And, he went on to note that: "I'm not quarreling with Mr. Butler and I'm not over here raising cane because discovery wasn't given to me." When it was clear to the Court that some discovery still needed to be provided, Judge Thompson announced his decision to continue the case off the November 26, 2007 trial calendar. He went on to note for the record that: "I, too, agree with you (both Mr. Butler and Mr. Denning) that coming into a case in September, such as this, the State having to do a lot of catch up. I also appreciate that it's difficult for the State to get information that they want sometimes. I understand that. So, I am not pointing fingers at either side."

10. The allegations of paragraph 10 of the Complaint are admitted.

11. The allegations of paragraph 11 of the Complaint are admitted.

12. The allegations of paragraph 12 of the Complaint are admitted. It is further admitted that Mr. Denning pointed out to Mr. Butler that he had discovered notes on an interview by a representative of the Johnston County Sheriff's Office with a man named Charles Byrd on August 1, 2006 in which there was reference to a prior interview with that same witness on July 18. Mr. Denning contended that he did not have any records of such an interview (July 18, 2006 or the day the homicide occurred). Mr. Butler then made the personal effort to review all of the files and spoke with representatives of the Sheriff's office during which he found the statement in question which he immediately provided to Mr. Denning. In a later hearing on November 30, 2007, and in reference to this particular statement of Mr. Byrd, Mr. Denning commented on the fact that this statement had not been provided to him, but went on to state: "I'm satisfied that it wasn't provided to the State either." (Transcript of Hearing, November 30, 2007)

13. The allegations of paragraph 13 of the Complaint are admitted in that the Defendant did indicate that he would seek the assistance of law enforcement officers in again looking through their files for information related to the charges against Ms. Bassett and would thereafter provide any such information found which had not previously been turned over to the defense. In reality, this is what occurred with the files from the Sheriff's office which were "discovered" by the Defendant on or about March 11, 2008 and which were turned over to Mr. Denning on the following day, March 12, 2008.

14. The allegations of paragraph 14 of the Complaint are admitted.

15. In response to the allegations of paragraph 15 of the Complaint, it is admitted

that Mr. Denning did express his personal opinion that the SBI or some other law enforcement agency had some phone records, but this statement came in direct response to a comment that he (Denning) had just recently met with SBI Agent Hicks to discuss this very issue and that the meeting had occurred in the District Attorney's office over a lunch break.

16. The allegations of paragraph 16 of the Complaint are admitted in that Mr. Butler did state to the court that it was his information that the State had provided the defense all phone records which they had received from investigating officers. This statement relied, in part, on the fact that there had been meetings between Mr. Butler, Mr. Denning and SBI Agent Hicks, in which this topic had been discussed. At the same time, Mr. Butler went on to state to the Court that "we (State) have a continuing duty to continue to disclose if new information comes in." In recognition of this "continuing" duty, Mr. Butler complied with that responsibility and is now the subject of this public Complaint for having done so.

17. In response to the allegations of paragraph 17 of the Complaint, it is admitted that, on February 12, 2008, this Defendant expressed his opinion and belief that the defense had been provided copies of all relevant documents from the files of the investigating law enforcement agencies in this matter.

18. The allegations of paragraph 18 of the Complaint are admitted in that this Defendant did locate some documents which he had not previously seen on or about March 11, 2008 in his final preparation for trial and, while he thought that the defense had seen most of the documentation in these files and in an effort to comply with his "continuing" duty to disclose new information, he provided the entire file of some 437

pages to Mr. Denning (much of which Mr. Denning would later concede he had already been provided).

19. In response to the allegations of paragraph 19 of the Complaint, it is admitted that the records provided to defense counsel in the *Bassett* case contained information relating to livor mortis which was somewhat different than what had previously been provided, but it is denied that any of the information was exculpatory.

20. The allegations of paragraph 20 of the Complaint are admitted.

21. In response to paragraph 20 of the Complaint, it is admitted that the State Bar has correctly cited and quoted from N.C. Gen. Stat. § 15A-903(a)(1).

22. In response to paragraph 21 of the Complaint, it is admitted that the State Bar has correctly quoted from a portion of N. C. Gen. Stat. § 15A-903(a)(1).

23. The allegations of paragraph 23 of the Complaint are denied.

24. The allegations of paragraph 24 of the Complaint are admitted.

25. In response to the allegations of paragraph 25 of the Complaint, it is admitted that, upon motion of the defendant and with the concurrence of Mr. Butler on behalf of the State, the trial of Tiffany Ann Bassett was continued for one month or April 21, 2008, as a result of the defense receiving some additional discovery which it had not previously seen.

26. In response to the allegations of paragraph 26 of the Complaint, it is admitted that the State Bar has recited some selected portions of the Order entered in open court on March 18, 2008 and signed by the Hon. E. Lynn Johnson on March 24, 2008.

a. The full statement referred to in this subparagraph contained in the order of Judge Johnson is: "In open court, the State of North Carolina, through

Assistant District Attorney Greg Butler, conceded that the *Defendant was prejudiced by the late and untimely disclosures.*” (the emphasized portion being the only portion quoted by the State Bar in its Complaint).

b. In response to this subparagraph of paragraph 26, the quoted reference from the Order is correct and admitted although it leaves out the fact that this trial had been scheduled to start in the “Twelfth Judicial District” (Cumberland County).

FURTHER ANSWERING THE COMPLAINT of the Plaintiff, the Defendant alleges and says as follows:

Gregory C. Butler, the Defendant in this proceeding, had no involvement in the case of *State v. Tiffany Ann Bassett* (Johnston County Superior Court 06 CRS 56645) until more than a year had passed since the arrest of Ms. Bassett. In that period of time, there had been numerous discovery motions filed by Ms. Bassett’s attorney, Robert Denning which had been responded to by the State during that period of time prior to this Defendant’s involvement in this case. In a letter from Mr. Denning to the State Bar dated May 27, 2008 (a copy of which is attached and marked as Exhibit A to this Answer), Mr. Denning refers to the *Bassett* case as a “hot potato” for the manner in which it was passed around the District Attorney’s office. In that letter, he states that the “problems with discovery and the first trial date (November 26, 2007) were not the fault of Mr. Butler, as he had just only recently received the case...” In his reference to the 437 pages of material delivered to him on March 12, 2008, Mr. Denning wrote that “Most of the documents had been previously provided to me at one time or another.” He went on to state that: “I feel very strongly that it’s retention by the State (referencing the 437 pages

of material) was not intentional, but certainly an oversight. *A couple of days prior to the production of this information, Mr. Butler personally informed me that new information was forthcoming and it contained information which I would like, or words to that effect....Certainly this 'head's up' was something that he may not have been required to do...*" This letter to State Bar by Mr. Denning was sent after the Bar had opened its investigation into the matter which is now before the Disciplinary Hearing Commission, shortly after the case against Mr. Bassett had been continued and prior to the time that she would plead "Guilty" to Second Degree Murder after having seen and reviewed all the documents contained in the disclosure of March 12, 2008. Mr. Denning provided a copy of this letter to Mr. Butler.

As stated by Mr. Butler in one of his first hearings in this matter, once he was assigned the *Bassett* case: "We have been feverishly, since I've been involved in this case, complying with discovery. (Transcript, October 29, 2007 hearing before Hon. Jack A. Thompson). In a later hearing on January 3, 2008 in which discovery issues were again discussed before Judge Thompson, he concluded that: "It appears to me there's been sufficient compliance (with past discovery orders) and I will so rule." (Transcript, January 3, 2008 hearing before Hon. Jack A. Thompson). Nevertheless, and in conformity with his continuing duty to provide newly discovered evidence to the defense, when Gregory C. Butler found some notes in a file which had not previously been delivered to the District Attorney's office and which he had not seen, he immediately contacted defense counsel and advised him of this discovery and, without any hesitation, ordered that the entire 437 pages be copied and delivered to Mr. Denning even though he

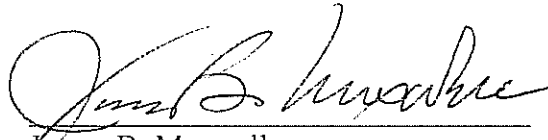
believed that much of the information had previously been provided (as is confirmed by Mr. Denning's letter, attached as Exhibit A).

Gregory C. Butler met his obligations under the North Carolina Rules of Professional Conduct for attorneys rendering public service in the office of District Attorney, as well as North Carolina General Statutes and state and federal case law in immediately providing to the defense information which he believed may not have been previously provided to it as soon as he discovered it. This appears to be the mandate and intent of such rules and statutes.

A licensed attorney serving as a District Attorney can only provide such information to the defense as it provided to him or her by the various law enforcement agencies involved in the investigation of any alleged criminal conduct. If, for whatever reason, all materials, documents or evidence are not delivered or revealed to the District Attorney in a timely manner, then his/her obligation is to deliver such undisclosed or undelivered evidence or documents discovered by the District Attorney to defense counsel as soon as practicably possible after such discovery. Gregory C. Butler complied with this mandate and the initial court ordered delay of one month for Ms. Bassett's trial (to which Mr. Butler, on behalf of the State consented) did not constitute conduct that was prejudicial to the administration of justice.

WHEREFORE, Gregory C. Butler moves the Disciplinary Hearing Commission to enter an Order dismissing the Complaint filed against him herein and for such other relief as the Commission may feel appropriate.

This the 26th day of May, 2009.

A handwritten signature in cursive script, appearing to read "James B. Maxwell", written over a horizontal line.

James B. Maxwell
Attorney for Gregory C. Butler
P. O. Box 52396
Durham, NC 27717
(919) 493-6464
State Bar No.: 2933

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May 27, 2008

TO WHOM IT MAY CONCERN

Dear Sir or Madam:

I am the attorney for Tiffany Bassett, the person upon whom on or about March 12, 2008 four hundred and thirty-seven pages of discovery was served just prior to trial scheduled to begin March 17. I write this letter in hopes to dispel any opposed concerns and in an effort toward a full understanding of my perceptions of the actions of Mr. Butler.

To begin with, the prosecution of Ms. Bassett's case seems to have been passed around much like a hot potato. The Honorable Thomas H. Lock began personally prosecuting the matter following Ms. Bassett's arrest in July of 2006. Based on conversations with now Judge Lock, he did so because he knew that the forensic evidence would not be available for some time and due to the two assistants, the Honorable Dale Stubbs and the Honorable Susan Doyle, to whom he would normally assign the case both were involved in an election to become the next District Attorney. Following Ms. Doyle's becoming the District Attorney, she personally prosecuted the matter rather than assign an assistant. The early discovery motions were heard with her personally representing the State. Mr. Butler was given the case only after the DNA results were made available and not too long before the first trial date. The problems with the discovery and the first trial date were not the fault of Mr. Butler, as he had just only recently received the case, but rather, the necessity of the case having been continued from the November 2007 trial date was, for the most part, based on the delay in getting the DNA evidence.

EXHIBIT A

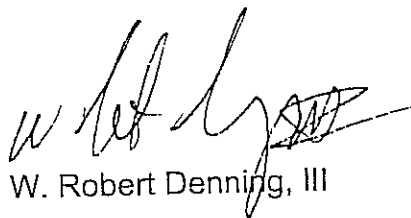
The matter was subsequently scheduled for trial March 17, 2008. During this time period, between court dates, I argued several motions to compel discovery. Mr. Butler represented the State. On or about March 12, 2008, four hundred thirty-seven pages of additional discovery were served upon me. Most of the documents had been previously provided to me at one time or another, however, the packet of discovery did contain the items that I had argued very passionately to be produced over the preceding several months, notably the officer's handwritten notes in accordance with the new discovery laws.

While some of the contents of this four hundred thirty-seven pages were exculpatory, in my opinion, and it contained items specifically previously requested, I feel very strongly that it's retention by the State was not intentional, but certainly an oversight. A couple of days prior to the production of this information, Mr. Butler personally informed me that new information was forthcoming and it contained information which I would like, or words to that effect, which signaled to me that contained within this voluminous production were matters that may prove exculpatory to my client. Certainly, this "head's up" was something that he may not have been required to do, but it did encourage me to give the new discovery a very thorough examination.

I remain available should you have any questions.

Sincerely,

LUCAS, DENNING & ELLERBE, P.A.



W. Robert Denning, III

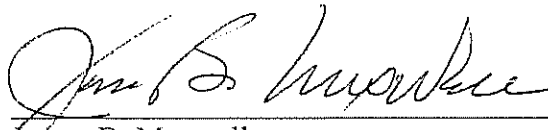
WRD/crb

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer has been served upon the following by depositing a copy of same in the United States mail, postage prepaid and addressed as follows:

Carmen K. Hoyme, Deputy Counsel
William N. Farrell, Deputy Counsel
North Carolina State Bar
P. O. Box 25908
Raleigh, NC 27611

This the 26th day of May, 2009.

A handwritten signature in cursive script, appearing to read "James B. Maxwell", is written over a horizontal line.

James B. Maxwell
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